

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ERNESTO SIMPSON,
Plaintiff,

v.

HARRIS COUNTY, et al.
Defendants.

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CIVIL ACTION NO. 4:25-CV-02600

JURY DEMAND

**DEFENDANTS HARRIS COUNTY, HARRIS COUNTY PRECINCT 4 CONSTABLE MARK HERMON,
DEPUTY RAMON RUIZ AND HARRIS COUNTY ATTORNEY CHRISTIAN MENELEE'S CERTIFICATE
OF INTERESTED PARTIES**

TO THE HONORABLE JUDGE OF SAID COURT:

Defendants Harris County, Harris County Precinct 4 Constable Mark Hermon, Deputy Ramon Ruiz and Harris County Attorney Christian Menefee ("Defendants") file this Certificate of Interested Parties. In support of said certificate, Defendants identify the followings persons whom they believe may have a financial interest in this litigation as of the date of this certificate:

1. Ernesto Simpson, c/o James M. Anderson, P.O. Box 58554, Webster, Texas 77598-8554.
2. Harris County Precinct 4 Constable Mark Hermon, Defendant, c/o Rachel Fraser, Harris County Attorney's Office, 1019 Congress, Houston, Texas 77002.
3. Deputy Ramon Ruiz, Defendant, c/o Rachel Fraser, Harris County Attorney's Office, 1019 Congress, Houston, Texas 77002.
4. Harris County Attorney Christian Menefee, Defendant, c/o Rachel Fraser, Harris County Attorney's Office, 1019 Congress, Houston, Texas 77002.
5. Harris County, Defendant, c/o Rachel Fraser, Harris County Attorney's Office, 1019 Congress, Houston, Texas 77002.

Date: June 26, 2025

Respectfully submitted,

CHRISTIAN D. MENEFEE
HARRIS COUNTY ATTORNEY

JONATHAN G. C. FOMBONNE
DEPUTY COUNTY ATTORNEY AND FIRST
ASSISTANT

NATALIE G. DELUCA
MANAGING COUNSEL,
DEFENSIVE LITIGATION, EMPLOYMENT, & REAL
ESTATE DIVISIONS

By: /s/ Rachel Fraser
RACHEL FRASER
Senior Assistant County Attorney
State Bar No. 24079725
Fed Bar No. 4067195
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OFFICE OF THE HARRIS COUNTY ATTORNEY
Harris County Attorney's Office
1019 Congress
Houston, Texas 77002

**ATTORNEY FOR HARRIS COUNTY,
CONSTABLE MARK HERMON, CHRISTIAN
MENEFEE AND DEPUTY RAMON RUIZ**

CERTIFICATE OF SERVICE

I certify that, on June 26, 2025, pursuant to Federal Rules of Civil Procedure, a true copy of the instrument to which this Certificate is attached was duly served upon each party to this cause on the CM/ECF system, which will automatically serve a Notice of Electronic Filing.

/s/ Rachel Fraser
Rachel Fraser